RESPONSE TO COMMENTS REPORT

NICTA's response to stakeholders' comments on the Consultations Paper on the Proposed Universal Access and Services Projects 2019

26th October 2018

Contents

1. INTRODUCTION

On 3rd of August 2018, NICTA commenced a public consultation seeking submissions on a Consultation Paper entitled "Proposed Universal Access and Service Projects 2019" (the "UAS 2019 Consultation Paper").

NICTA also conducted a series of regional Public Consultation Meetings seeking inputs and comments from interested parties on the 2019 Consultation Paper. The regional consultation meetings were held on the following dates and venues:

- 13th August, 2018 – Mt Hagen, Highlands Region
- 20th August, 2018 – Port Moresby, Southern Region
- 29th August, 2018 – Lae, Momase
- 29th August, 2018 - Kokopo, NGI Region.

The Public Consultation Meeting comprised of two (2) sessions; the first session aimed at providing an overview of NICTA with emphasis on the UAS regime set out in the National ICT Act 2009 (*the* Act), followed by a session focused on the 2018 to 2019 Strategic Planning Report and 2019 UAS Projects. A total of 92 participants attended the consultation meetings. NICTA also conducted in-person meetings with interested stakeholders following the consultation meetings.

The deadline for submission was set as 7th September, 2018. NICTA noted no further request for extension.

Written submissions were received from:

1. Seventh Day Adventist Church (New Britain New Ireland Region)
2. Reformed Ministry Church Networks of PNG (Cayhill Church)
3. EMTV Media Limited
4. Manus Professionals for Community Development Inc
5. Micha Yanage
6. Simkar Coffee Growers Association
7. Digicel (PNG) Ltd
8. PNG University of Technology (UNITECH) – Electrical & Communications Engineering Department
9. East New Britain Provincial Government

Late written submissions were received from Digicel PNG Ltd, PNG University of Technology, Electrical & Communications Engineering Department and East New Britain Provincial Government respectively.

All comments and submissions made were considered.

In Part 2 and 3, this Response Report provides a summary of the key comments and issues that were raised during the consultation meetings and through the formal submissions received from the operators and other stakeholders, and some comments from NICTA staff.

NICTA also wishes to clarify that no final decision or reporting relating to 2019 UAS Projects or a 2019 UAS Levy had occurred at the time of the UAS 2019 Consultation Paper. Instead, the UAS Board had approved NICTA releasing the UAS Consultation Paper including the Attachments as draft documents for the purpose of consultation with interested parties.

The request for proposals (RFPs) for 2019 UAS projects will provide for appropriate sharing of UAS funded facilities and compliance with relevant requirements of the Act which deemed these to be declared services to which specified access requirements apply. The definition and description of some of the identified 2019 UAS Projects also have been enhanced and confirmed in accordance with the 2018 – 2022 Strategic Planning Report which is used as a background document for information purposes, to assist with planning and decision- making related to UAS Projects, and does not involved any proposed or actual decision about UAS projects or funding over this planning horizon.

Having due regard to the comments made by stakeholders, the UAS Board and NICTA will proceed to complete the processes under the Act for the 2019 UAS Projects and Levy. This will include the Report of the UAS Board to the Minister under Section 108 (2) - (3) as to the proposed 2019 UAS Projects.

2. OVERVIEW OF PRIMARY COMMENTS RECEIVED AND NICTA STAFF'S CONSIDERATION OF AND RESPONSE TO THOSE COMMENTS

The tables below summarize some of the key comments/discussion during the consultation meetings held at the respective regions. Where some specific points or language may not be directly addressed, all comments received were considered and have been taken into account.

2.1   HIGHLANDS REGION

Highlands Region's comments and views raised during the consultations meeting:

Reference/Subject	Summary of Comments	Summary of Comments in Response
Broadcasting	A FM Radio broadcaster acknowledged FM Broadcasting service playing a vital role in disseminating important information to the rural populations and continues to be instrumental in shaping society. The broadcaster was pleased with the inclusion of Broadcasting services into the UAS Projects. It was further mentioned that the FM Radio station receives increasing requests from locals to air local contents including news and events. The radio station has enquired on the possibility under the UAS funding for development of local contents.	NICTA staff notes that this input in principles supports projects proposed under "Program 4: Extension of Broadcasting Network Coverage" in 2019.

e-Agriculture	A representation from a small coffee growers' association acknowledges and appreciates the importance of ICT as a tool to improve agricultural industry. Reference was made to the recently concluded training on e-agriculture facilitated through a collaboration between ITU, FAO, DAL and NICTA in Jiwaka Province. The association foresees the potential to market and promote their coffee and other crops more cost effectively through the use of marketing platforms on the internet. The association recognizes utilising ICT to bypass middle-man would drastically reduce costs for local coffee farmers and subsequently increase their revenues. Furthermore the association pointed out that any ICT projects related to help local farmers increase their profitability would certainly make a difference in the farmers livelihoods.	NICTA staff notes that this input in principle supports the projects proposed under "Program 2: Community and Institutional Broadband Networks" in 2019.
Digital Literacy Training	A church representative posed a question to NICTA on which UAS projects would churches and NGO benefit in regards to social services provided by them. It was further deliberated by the church that even though all in the UAS Plans include projects that generally empower all citizens through universal access/connectivity, specific programs can be developed particularly under Program 3: ICT Platform for Future Growth, by implementing projects that increase digital literacy and uptake of ICT services amongst specific target populations, e.g. youths, women, people with disabilities.	NICTA staff notes that this input in principle supports the projects under "Program 3: ICT Platform for Future Growth" in 2019.

2.2   SOUTHERN REGION

Southern Region's comments and views raised during the consultations meeting:

Reference/Subject	Summary of Comments	Summary of Comments in Response
Awareness	A good number of participants' whilst acknowledging the initiative taken by NICTA to consult interested parties on the UAS projects urged NICTA consider the following: - NICTA to conduct awareness campaign down to the province and district levels - Target the MPs and DDAs and especially those in the planning and resource allocation sector so they can be aware of how their money can be spent. - As much as possible should consider making awareness to the LLG and community leaders for such impact projects. - Also suggested that NICTA together with other sector/department can plan and do different awareness in a more coordinated manner to save cost and leverage on other resources. - It was stressed that the it is part of the contract to conduct awareness of the services that will be provide (by the contractor)	NICTA staff in consultation with the UAS Board and NICTA Board will take into account these matters in planning future consultations and awareness program. NICTA also noted that in the past, contractors engaged to implement projects under Projects Agreement stipulated that that contractors were required to promote and conduct awareness and promotion of services they were contracted to provide.
Sustainability & Affordability issue	- How is the sustainability being considered? Can the UAS fund also be	NICTA staff acknowledges that sustainability is a key consideration in project identification and selection and

	made available help sustain the service especially for those areas in the remote. - It was also suggested the UAS fund can take care of the infrastructure while the operation, customer take up and content can be funded by the government through some appropriations.	these factors taken into consideration in the planning of the projects. NICTA staff acknowledges that affordability is a key consideration in project identification and selection taken into consideration in the planning of the projects.
Option for funding	- Seek funding from other donors like AUSAID, ADB and World Bank etc - Approach MPs for their use of DSIP funds.	- NICTA will consider and explore funding sources for UAS Projects in accordance with the Act
Content and usage (take up)	- Query was raised on the use of online application forms by grade 12s as introduced by the Higher Education. NICTA to work with the responsible department to map out how each school can have access to internet service. - For content creation, we need to consider target audience, the language to be used, the applications, location and the platform (desktop or mobile etc) - The content can be either be web based or local. - There was a suggestion to create a technical group that will discuss technical aspects of the projects and provide advice NICTA if required.	- NICTA notes that comments highlight the need for focussed efforts an ongoing project under taken by the Department of Higher Education. These comments can be fully considered when considering project under Programs 2 and 3 proposed for 2019. In any case, the comments appear to support NICTAs proposals for Projects under Program 2 and 3 for 2019. - NICTA also noted that in the past, contractors engaged to implement projects under Projects Agreement stipulated that that contractors were required to promote and conduct awareness and promotion of services they were contracted to provide. - NICTA will consult the various stakeholders in finalising
Broadcasting	- For broadcasting services (Radio & TV) would need 80 to 100 meter towers to effectively serve the surrounding populations.	- Current arrangement is that all new greenfield tower projects would be subject to sharing and broadcasting projects are expected to co-locate and share towers with other projects unless there is justified reasons for not doing so.

Acceptance of the Proposed 2019 project	The participants accepted the proposed 2019 projects according to the UAS strategic plan 2018-2022	NICTA acknowledges that the support and approval by the southern regional consultation meeting is in principle for various projects under the four programs proposed by NICTA for 2019

2.3 NGI REGION

NGI Region's comments and views raised during the consultations meeting:

Reference/ Subject	Summarized Comments	Summary of Comments in Response
e-Learning	With the onset increasing focus on ICT, amongst other applications, E-learning is one application that is gradually becoming prominent in ICT discussions compared to recent years.	
ICT Service Outrage Complaints	A Digicel site in Woodlark Island in Milne Bay Province was reported to be down for well over 18 months. There is need for services once installed, particularly in the rural areas, to ensure services are available and operational.	NICTA emphasized the need for citizens to report outage of services for appropriate action by NICTA. The participants were further informed and operators were reminded of the service restoration requirements.
Quality of Service (3G/4G)	Signal levels and quality of mobile internet service (3G/4G) is often very slow and not at the required speeds in the locations outside of the main urban centres for various reasons including lack of adequate backhaul.	NICTA staff notes that UAS projects for Mobile expansion including 3G and 4G data services are supported in principle. NICTA staff fully notes that quality of service complaints relating to inadequate backhaul in certain areas. NICTA will consider implementing backhaul projects as part of the 3G and 4G UAS Projects for areas that may technically qualify

ICT Rollout Challenges	Licensed operators strongly acknowledged and appreciate NICTA noting, highlighting and sharing with the wider public the challenges faced by the government and operators in rolling out ICT infrastructure and services particularly in rural PNG. The operators affirmed and identified with the challenges presented by NICTA.	NICTA notes the operators shares the same and or similar challenges in implementing ICT projects.
Infrastructure Sharing	The commercial relevance of remotely located communication towers was a point of concern operators. Subsidizing towers would certainly help ICT operators to venture into providing service in remote locations.	NICTA staff reiterate that UAS Projects are deemed to be declared pursuant to Section 131 of the Act and are therefore subject to sharing in accordance with terms and conditions to be agreed by the access seeker and the access provider.

2.3.1 ONE TO ONE SESSION

Date: 29th August, 2019 – Session # 1

Participant	Date/Time	Comments/Questions
Niugini Infocom	29 August 1:30 – 2:00 pm	Niugini Infocom proposed the idea of providing internet trunks to small district towns/stations using PNG DataCo trunks as primary links with satellite as backup. In the absence of PNG DataCo PoP, only satellite would be employed.
		For a small ICT operator, the provision of internet services in small rural towns to single customers is commercially unviable as a single revenue stream is often insufficient to meet the costs of maintaining the internet service. When using satellite, a ballpark of K8000-K9000 a month is the minimum needed to maintain the service. The current wholesale rates made it difficult for sustainable provision of services.

		From the perspective of the small ISPs, the commercially viable approach is to turn the single source of revenue into multiple revenue streams by providing an internet trunk which accessible to multiple government agencies/offices (e.g. schools, health centres) and local businesses.
		NICTA staff and UAS Board will consider the above issues in project development. Niugini Infocom was reminded of the requirement for all ISPs participating in NICTA's UAS Projects to be connected to IXP. .
NBC ENB	2:00 – 2:30 pm	UAS Team covered the following key areas in the interview: • Background on NICTA • UAS regime and processes • UAS Projects implemented to date • Purpose of the Public Consultation for 2019 UAS Projects • Tentative timeline of activities for the 2019 UAS Projects

Date: 31st August, 2019 – Session #2

Attendee	Date/Time	Comments/Questions
ENB Provincial Administration	31 August 2:00 – 5:00 pm	ENB recognizes the importance of ICT and the Provincial Administration fully appreciates NICTA's visit to the region and the province to consult on the UAS Projects and the development of the ICT sector at large.
		ENB to date has not engaged with any ICT service provider/mobile operator in rolling out towers as is the case with some other provinces.
		ENB in prior years operated a two-way radio communication system effectively in the very remote parts of the province. The system included four (4) towers spread throughout the province which are now inoperable.

		Broadcast (NBC radio) signals which previously provided extensive coverage throughout the province especially through the shortwave service is now available only in FM broadcasts which are limited largely to the town areas and little pockets of the surrounding rural areas. The dissemination of information to the remote regions of the province is seen as critical for the development of the province, particularly light of its history of volcanic eruptions.
		With National Governments' rollout of the Integrated Financial Management System (IFMS) throughout the country including ENB, the Provincial Administration stressed the importance of connecting all its districts/LLGs to the internet to access and utilize the IFMS system. The Provincial Administration admitted to facing issues with processing payments through the IFMS owing to lack of reliable internet connectivity.
		ENB has four (4) districts with eighteen (18) LLGs. Gazelle District is the most densely populated. Pomio District has the least population which is also sparsely distributed.
		The ICT division of the Provincial Administration made enquiries about the possibility of utilizing the equipment (server) installed at the Provincial Administration through the IGIS roll out which are currently sitting idle. NICTA staff noted that IGIS project is managed by the Department of Communications and Information Technology and it status will should be taken with the Department.
		The ICT division revealed their own inhouse plans for a provincial network. They have made the commitment to seek NICTA's assistance through the UAS Project, particularly sharing of towers to realise the provincial network plan.
		The Provincial disaster office requested NICTA's assistance to develop set up an emergency warning system for the province. The disaster office advised that despite the province suffering immensely during the volcanic eruptions in the past, no warning systems had been put in place. In one of the last major eruptions, natural phenomena including birds and animals fleeing the volcano hours before its eruption was all the warning the locals had to flee for their lives. NICTA staff notes that importance of such a project and will further consideration and consul other concerned government agencies.

2.4   MOMASE REGION

Momase Region's comments and views raised during the consultations meeting:

Reference or Subject	Summary of Comments
Collaboration	- A final year student from Unitech commented on one approach the UAS can consider specifically with the Program 3 targeting the Department of Distance Learning (DoDL). The UAS can collaborate with the University of Technology specifically the Department of Electrical and Communication Engineering and the Department of Computer Science to develop apps that can be utilised by the DoDL to access their content for distance learning from anywhere. - Expert technical expertise should also be sought from abroad to collaborate in some of the projects moving forward and proper processes should be established by the appropriate agencies to facilitate such collaborations.
Infrastructure Sharing	- Participants sought clarification on infrastructure sharing arrangement pertaining to UAS. NICTA staff will issue draft guidelines for UAS facilities particularly tower sharing.
Broadcasting	- NICTA staff notes a comments proposing legislative amendments to accommodate Digital TV or the transition from Analog to Digital TV. NICTA staff notes that this comment is outside the scope of the 2019 Project UAS consultation.
Consultation deadline	- The public consultation deadline is on the 7th September, 2018. All participants are encouraged to submit any comments or issues discussed in written form.

3. SUMMARY OF SUBMISSIONS RECEIVED

The table below summarizes the main points of each submission, together with the responses of NICTA UAS Secretariat. Where some specific points or language may not be directly addressed, all comments received were considered and have been taken into account.

No.	Submission	Reference/Subject	Summary of Comments	NICTA staff's Response(s)
1	Adventist Hope Radio Community Project in the New Britain New Ireland Region	i. Infrastructure Construction - Tower	The New Britain New Ireland Mission of the Seventh-day Adventist Church through its Communication Media Department is seeking funding support from the UAS Fund to establish communication towers in ENB, WNB and New Ireland provinces as part of the bigger project for the Seventh-day Adventist Church in Papua New Guinea for the broadcasting of its new radio station Adventist Hope Radio 107.5FM. Broadcasting.	The UAS Secretariat and the UAS Board will take into account the proposed locations in the design and selection of specific UAS project under Program 1 and 4.
		ii. Digital Technology Workshops	Suggestion of Digital Workshops to be conducted to increase and expand knowledge in digital and technology to the church membership and others who may be interested.	The UAS Secretariat and the UAS Board will take into account the proposed locations in the design and selection of specific UAS project under Program 3.
		iii. Communication Towers (Backbone Network)	Manus Communication Tower to be utilised for the Adventist Hope Radio, TV and Internet Providers.	The UAS Secretariat and the UAS Board will take into account the proposed locations in the design and selection of specific UAS project under Program 1 and 4.

2	Reformed Ministry Church Networks of PNG - Cayhill Church	i.	Digital Literacy Training for youths	Empowering Church Youths to access ICT services through Digital Literacy Training - project aims to empower especially Christian Youths within the churches and other known denominations within North Waghi District and Jiwaka Province, in promoting the use of e-mails, face book, and other important electronic methods to improve their livelihoods through small businesses and schools. Identifying one of the key issues is to eradicate illiteracy and to avoid ignorance and misuse of ICT in the young generation.	The UAS Secretariat and the UAS Board will take into account the proposed locations in the design and selection of specific UAS project under Program 3.
		ii.	Infrastructure – Tower Construction	Seeking UAS fund to construct a 30 metre tower on a nearby hill to cover five (5) different tribes with almost seven (7) LLG Ward Councils, and an estimated population of 7000+people affected with weak on no coverage of Digicel, B-Mobile and Telikom coverages.	The UAS Secretariat and UAS Board will take into account the proposed locations in the design and selection of specific UAS project under Program 1.

3	EMTV Media Limited	Expansion of TV Coverage	Request to fund extension of EMTV's Free to Air signals to Alotau Town, Milne Bay, Popondetta in Oro, Rigo in the Central and Malalaua in the Gulf Provinces respectively to cater for a total population of 26,000.	The UAS Secretariat and the UAS Board will take into account the proposed locations in the design and selection of specific UAS project under Program 1 and 4.
4	Manus Professionals for Community Development Inc	Infrastructure Construction - Manus Communication Towers (Backbone)	To provide infrastructure for a communication ring network that can provide communication services to a wide area of the remote areas of Manus Province. Request to fund 11 towers under UAS project to cover slight over 21,000 population The Backbone network also provides the infrastructure to expand and build into schools and health centres to bring forth connectivity into the schools and health centres. Post offices, banking systems, internet cafes, remote learning.	The UAS Secretariat and the UAS Board will take into account the proposed locations in the design and selection of specific UAS project under Program 1 and 4.
5	Micha Yanage	Number Portability, Local Roaming & Co-Sharing	• Recommendations to: • Facilitate Number Portability within	NICTA staff have conducted a public Inquiry into the potential implementation of mobile number portability in

				different networks or operators	PNG and has submitted its Report to the Minister in late 2017. The Minister's action on the Report is pending. NICTA Staff agree: National roaming is a requirement for funded projects NICTA staff reiterate that UAS Projects are deemed to be declared pursuant to Section 131 of the Act and are therefore subject to sharing in accordance with terms and conditions to be agreed by the access seeker and the access provider.
			• Enable Local Roaming within different networks or operators.	
			• Push legislation for Co-sharing of Network Infrastructure (Passive first then Active)	
6	Simkar Coffee Growers Association	i. Digital Literacy Training for small coffee growers/farmers.	Empowering local coffee growers (farmers) to access international coffee markets through Digital Literacy Training.	The UAS Secretariat and UAS Board will take into account the proposed locations in the design and selection of specific UAS project under Program 3.
			The digital literacy training project will see local coffee farmers taught basic ICT tools including firstly how to use touch screen phones plus laptop/desktop, open face book accounts, surfing the internet and sending e-mail among other uses to be on par with today's	

			competitive digital business environment (e-business/commerce).	
		iii. Infrastructure – Tower Construction	Seeking UAS fund to construct a 30 metre tower on a nearby hill to cover five (5) different tribes with almost seven (7) LLG Ward Councils, and an estimated population of 7000+ people affected with weak on no coverage of Digicel, B-Mobile and Telikom coverages.	The UAS Secretariat and the UAS Board will take into account the proposed locations in the design and selection of specific UAS project under Program 1.
7	University of Technology (UNITECH	Content creation, and take up	- Broadband network for distance learning-DODL - Online library application - Digital broadcasting - Mobile learning Device	NICTA staff agrees with the suggestions and UAS Secretariat and Board will take into account the proposed locations in the design and selection of specific UAS project under Program 3.
		Access to Broadband	- Computer laboratories for secondary schools - Institutional connectivity - Community ICT centres	NICTA staff agrees with the suggestions and UAS Secretariat and Board will take into account the proposed locations in the design and selection of specific UAS project under Program 2.
8	Digicel (PNG) Ltd	Comments did not relate to any projects in particular	The consultation paper did not contain any details of	The purpose of the consultation is not give specific details of the project

			specific UAS projects that were proposed for 2019.	but to gauge views on the indicated programs, projects, priorities and indicative costs. The details will be in the bid document. Digicel misunderstood the purpose of the consultation.
		Comment based on estimated cost	Focus principally on the proposed indicative budget of K27 million for various program.	The K27million is only an indicative based on NICTA cost model cost as explained during the consultation. The real cost would be determined in the actual project scope with all other details. There is no issue here.
		Comments based on project details	There is no detail reasoning to support the indicative cost.	There is NO need for that, this is the high level discussion the detail will be included the actual project scope in the bid document. Digicel did not provide any indicative cost for NICTA to consider if they are so concerned about the costs.
		Comments on the processes of project management	Digicel also attended the consultation meeting on the 21st August in Port Moresby. The consultation paper proposed paper proposed K27 million for 2019 proposed NICTAs proposed	NICTA is disappointed that once again Digicel has chosen not to engage in the cooperative spirit of a substantive discussion on possible UAS Projects (in this case for 2019), but, rather,

		processes. This process suggested that NICTA was, and the UAS Board are proposing to proceed with determining the UAS project 2019 without any further consultation or reference to interested parties.	has chosen to offer procedural commentary and to express inappropriate concern that Digicel might not be permitted to be involved in the various stages associated with finalising UAS Projects for 2019. The submission of your letter on a Without Prejudice basis when cooperative interactions are required with all stakeholders, says much.

NICTA fully understands the requirements of the Act in relation to the UAS scheme and will ensure that those requirements are fulfilled. NICTA hopes that Digicel might see its way clear to make a more substantive and useful contribution to the identification and prioritisation of UAS Projects when opportunities arise in future. |
| | Project details | Disclose the details of actual UAS project for 2019 | This will be done as per tender and procurement processes. |

		Review project details	Afford Digicel and others a fair opportunity to review and comment	All interested parties have been given an opportunity to comment on the Projects for 2019. NICTA also consulted widely on the UAS Strategic Planning Report 2018 to 2021 which served as an information document for the planning of 2019 projects.
9	East New Britain Province	Infrastructure-Upgrade and expansion of mobile broadband network	To extend the mobile broadband to the rural and remote areas in East New Britain Province	NICTA agrees with the suggestion and UAS Secretariat and the UAS Board will take into account the proposed locations in the design and selection of specific UAS project under Program 1.
		Broadband to schools- Network, E-Library and internet broadband to learning institutions and internet connection to four district in the ENB	Established computer labs to seven identified schools, and network and internet links to the four districts	NICTA agrees with the suggestion and UAS Secretariat and Board will take into account the proposed locations in the design and selection of specific UAS project under Program 2.
		Expansion of broadcasting services in ENB	To extend the broadcasting (radio and TV) to the remote and rural areas of ENB	NICTA agrees in principle with the suggestion and UAS Secretariat and Board will take into account the proposed locations in the design and selection of

			specific UAS project under Program 4.